

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

REBECCA HACKE,

Plaintiff,

v.

ISOMEDIX OPERATIONS, INC., COSMED
GROUP, INC., and VANTAGE SPECIALTY
CHEMICALS, INC.,

Defendants.

Case No. 1:24-cv-03410

Judge Joan H. Lefkow

**JOINT STATEMENT OF DEFENDANTS ISOMEDIX AND COSMED
CONCERNING PLAINTIFF'S MOTION TO REMAND**

Defendants Isomedix Operations, Inc. (“Isomedix”) and Cosmed Group, Inc. (“Cosmed,” and collectively with Isomedix, “Defendants”), by and through counsel, hereby submit this statement concerning Plaintiff’s Motion to Amend Complaint and Remand (“Plaintiff’s Motion”). *See* Dkt. 14. Plaintiff’s Motion was insufficient, and Plaintiff failed to carry the burden to secure the relief requested. Therefore, Defendants do not believe that amendment or joinder was proper and do not concede the accuracy or correctness of any representations or arguments made in Plaintiff’s Motion. *See id.* Nevertheless, Defendants recognize that the Court’s Minute Entry, *see* Dkt. 16, allowing amendment and Plaintiff’s subsequently filed First Amended Complaint adding Vantage Specialty Chemicals, requires remand pursuant to 28 U.S.C. § 1447(e). *See* Dkt. 17. Defendants expressly reserve their rights to properly remove this action anew on any proper basis, including fraudulent joinder or further developments in this action.

Dated: June 14, 2024

/s/ Anthony D. Pesce

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Counsel for Isomedix Operations, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on June 14, 2024, a true and correct copy of this Joint Statement of Defendants Isomedix and Cosmed Concerning Plaintiff's Motion to Remand was filed and served on counsel of record via the United States District Court for the Northern District of Illinois's CM/ECF system.

Dated: June 14, 2024

/s/ Philip M. Oliss

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